

1 DANIEL E. LUNGREN, Attorney General  
of the State of California  
2 MICHAEL P. SIPE [BAR No. 47150]  
Deputy Attorney General  
3 110 West A Street, Suite 700 (92101)  
P. O. Box 85266  
4 San Diego, California 92186-5266  
Telephone: (619) 238-3391

5 Attorneys for Complainant  
6

7 BEFORE THE  
8 BOARD OF PODIATRIC MEDICINE  
DEPARTMENT OF CONSUMER AFFAIRS  
9 STATE OF CALIFORNIA

10 In the Matter of the Accusation ) No. D-4919  
Against: )  
11 )  
PETER B. HOLUB, D.P.M. ) DEFAULT DECISION  
12 915-1/2 Electric Avenue )  
Seal Beach, CA 90740 ) [Gov. Code { 11520]  
13 )  
License No. E-3279 )  
14 )  
Respondent. )  
15 )

16 JURISDICTION

17 1. On or about September 2, 1992, Complainant James  
18 Rathlesberger, in his official capacity as Executive Officer,  
19 Board of Podiatric Medicine, ("Board"), Department of Consumer  
20 Affairs, State of California filed Accusation No. D-4919 against  
21 Peter B. Holub, ("hereinafter "respondent").

22 2. On or about September 2, 1992, the Board caused to  
23 be served by certified mail to the address of record of  
24 respondent in accordance with section 11505 of the Government  
25 Code, Accusation No. D-4919, Statement to Respondent, Government  
26 Code sections 11507.5, 11507.6, and 11507.7, the Notice of  
27 Defense form (in triplicate), and a Request for Discovery, to

1 respondent's address of record with the Board which was and is  
2 915-1/2 Electric Avenue, Seal Beach, California 90740.

3 3. On or about September 16, 1992, respondent through  
4 his attorney, Rey L. Ochoa, P. O. Box 520, Seal Beach, California  
5 90740, filed and mailed a Notice of Defense pursuant to sections  
6 11505 and 11506 of the Government Code.

7 4. On or about January 12, 1993, at respondent's  
8 request a Stipulation In Settlement and Decision was sent to  
9 respondent's attorney. A copy of this document is attached  
10 hereto as Attachment "A" and is hereby incorporated by reference  
11 as if fully set forth.

12 5. On or about February 1, 1993, respondent's attorney  
13 sent to the Office of the Attorney General respondent's letter  
14 dated January 26, 1993, in which respondent admits the  
15 allegations charged, refused to "accept any of the terms and  
16 conditions which may stay this revocation," and accepts "your  
17 order of license revocation." Respondent gave a mailing address  
18 of: P. O. Box 988, Lockhart, Texas 78644-988. A copy of these  
19 documents are attached hereto as Attachment "B" and hereby  
20 incorporated by reference as if fully set forth.

21 FINDINGS OF FACT

22 6. The facts set forth in the Accusation are true. A  
23 copy of the Accusation is attached hereto as Attachment "C", and  
24 incorporated herein by reference as if fully set forth.

25 DETERMINATION OF ISSUES

26 7. Based on the above-mentioned findings of fact,  
27 cause exists to discipline respondent's license pursuant to

1 sections 490, 2234, 2264, and 2474 of the Business and  
2 Professions Code.

3 ORDER

4 WHEREFORE, the following Order is hereby made:


5 1. Podiatric Medicine License No. E-3279 issued  
6 to Peter B. Holub, is hereby revoked, and

7 2. Respondent shall not be deprived of making any  
8 further showing by way of mitigation, however, a  
9 showing must be made in writing to the Board of  
10 Podiatric Medicine, Medical Board of California, 1430  
11 Howe, Suite 8, Sacramento, California 95825, prior to  
12 the revocation of this license.

13 Dated this 27th day of May, 1993.

14 This Decision shall become effective on

15 June 26, 1993.

16  
17  
18   
19 MICHAEL VEGA, D.P.M.  
20 BOARD OF PODIATRIC MEDICINE  
21 DEPARTMENT OF CONSUMER AFFAIRS  
22 STATE OF CALIFORNIA

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26  
27 03576160-SD91AD0641

# **EXHIBIT A**

1 DANIEL E. LUNGREN, Attorney General  
of the State of California  
2 MICHAEL P. SIPE [BAR No. 47150]  
Deputy Attorney General  
3 110 West A Street, Suite 700 (92101)  
P. O. Box 85266  
4 San Diego, California 92186-5266  
Telephone: (619) 238-3391

5 Attorneys for Complainant  
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7 BEFORE THE  
8 BOARD OF PODIATRIC MEDICINE  
MEDICAL BOARD OF CALIFORNIA  
9 DEPARTMENT OF CONSUMER AFFAIRS  
STATE OF CALIFORNIA  
10

11 In the Matter of the Accusation	)	No. D-4919
Against:	)	
12	)	
13 PETER B. HOLUB, D.P.M.	)	STIPULATION IN
915-1/2 Electric Avenue	)	SETTLEMENT AND
Seal Beach, CA 90740	)	DECISION
14 License No. E-3279,	)	
15	)	
Respondent.	)	

16  
17 In the interest of a prompt and speedy settlement of  
18 this matter, consistent with the public interest and the  
19 responsibility of the Board of Podiatric Medicine, Medical Board  
20 of California, Department of Consumer Affairs ("Board") the  
21 parties submit this Stipulation and Decision to the Board for its  
22 approval and adoption as the final disposition of the Accusation.

23 The parties stipulate the following is true:

24 1. An Accusation, No. D-4919, is currently pending  
25 against Peter B. Holub, D.P.M., ("respondent"), before the Board.  
26 The Accusation, together with all other statutorily required  
27 documents, was duly served on the respondent on or about

1 September 2, 1992, and respondent filed his Notice of Defense  
2 (contesting the Accusation) on or about September 16, 1992. A  
3 copy of Accusation No. D-4919 is attached as Attachment "A" and  
4 incorporated by reference as if fully set forth.

5           2. At all times relevant herein, respondent has been  
6 licensed by the Board of Podiatric Medicine under License No.  
7 E-3279.

8           3. Respondent is represented by counsel, Rey L. Ochoa,  
9 Esq. in this matter, and complainant James Rathlesberger,  
10 Executive Director of the Medical Board of California, is  
11 represented by Daniel Lungren, Attorney General of the State of  
12 California by Michael P. Sipe, Deputy Attorney General.

13           4. Respondent has carefully read and is fully aware of  
14 the charges and allegations contained in Accusation No. D-4919 on  
15 file with the Board. Respondent understands the nature of the  
16 charges alleged in the Accusation and that the charges and  
17 allegations constitute cause for imposing discipline upon  
18 license to practice .

19           5. Respondent is fully aware of his right to a hearing  
20 on the charges and allegations contained in said Accusation, his  
21 right to confront and cross-examine witnesses who may testify  
22 against him, his right to produce witnesses on his behalf or to  
23 testify himself. Respondent understands his right to  
24 reconsideration, appeal and all other rights accorded to him  
25 pursuant to the California Business and Professions Code and  
26 Government Code and freely and voluntarily waives such rights.

27 ///

6. Respondent admits the charges contained in Accusation No. D-4919 as alleged. Respondent specifically admits that on or about December 19, 1990, he was practicing as a podiatrist with Peter S. Wadhams when Wadhams was not yet licensed to practice podiatric medicine and did unlawfully advertise that Wadhams was a podiatrist, thereby leading to respondent's conviction of a criminal charge on July 29, 1991, in Orange County as set forth more fully in paragraphs 11 through 18 of the Accusation.

7. The admissions, waivers and recitals set forth above are for the purpose of this stipulation only, and may not be used for any other purpose or in any other proceeding.

8. Respondent understands that by reason of the waivers and admissions set forth hereinabove, he is enabling the Board of Podiatric Medicine to enter the following order from this stipulation without further process. Should the Board not adopt this stipulation and order as its decision in this matter, the waivers and admissions between the parties shall have no force or effect.

## ORDER

IT IS HEREBY ORDERED that License number E-3279 issued to Peter B. Holub, D.P.M. is revoked. However, the revocation is stayed and respondent is placed on probation for three (3) years on the following terms and conditions:

## CONDITIONS

A. Within 60 days from the effective date of this decision, respondent shall submit to the Board of Podiatric

1 Medicine for its prior approval a community service program in  
2 which respondent shall provide free medical services on a regular  
3 basis to a community or charitable facility or agency for at  
4 least 400 hours, for the first 36 months of probation. Neither  
5 respondent nor respondent's practice nor any partner, associate  
6 or employee of respondent shall benefit financially from such a  
7 community service program.

8           B. Within 60 days of the effective date of this  
9 decision, respondent shall submit to the Board of Podiatric  
10 Medicine for its prior approval a course in Ethics, which  
11 respondent shall successfully complete during the first year of  
12 probation.

13           C. Respondent shall pay to the Board of Podiatric  
14 Medicine \$7,500.00, payable during the first year of probation,  
15 at the rate of \$625.00 or more per month until paid in full, for  
16 the actual and reasonable costs of the investigation and  
17 prosecution of this matter.

18           D. Respondent shall obey all federal, state and local  
19 laws, and all rules governing the practice of podiatric medicine  
20 in California.

21           E. Respondent shall submit quarterly declarations,  
22 under penalty of perjury, on forms provided by the Board of  
23 Podiatric Medicine, stating whether there has been compliance  
24 with all the conditions of probation.

25           Notwithstanding any provision for tolling of  
26 requirements of probation, during the cessation of practice

27 ///



1 respondent shall continue to submit quarterly declarations under  
2 penalty of perjury.

3 F. Respondent shall appear in person for interviews  
4 with the Board of Podiatric Medicine's medical consultant, upon  
5 request, at various intervals and with reasonable notice.

6 G. In the event the respondent fails to satisfactorily  
7 complete any provision of the order of probation, which results  
8 in the cessation of practice, all other provisions of probation  
9 other than the submission of quarterly reports shall be held in  
10 abeyance until respondent is permitted to resume the practice of  
11 podiatry. All provisions of probation shall recommence on the  
12 effective date of resumption of practice. Periods of cessation  
13 of practice will not apply to the reduction of the probationary  
14 period.

15 H. In the event respondent should leave California to  
16 reside or to practice outside the State, respondent must notify  
17 the Board of Podiatric Medicine in writing of the dates of  
18 departure and return. Periods of residency or practice outside  
19 California will not apply to the reduction of this probationary  
20 period.

21 I. Upon successful completion of probation,  
22 respondent's certificate will be fully restored.

23 J. If respondent violates probation in any respect,  
24 the Board of Podiatric Medicine, after giving respondent notice  
25 and the opportunity to be heard, may revoke probation and carry  
26 out the disciplinary order that was stayed. If an accusation or  
27 petition to revoke probation is filed against respondent during

1 probation, the Board of Podiatric Medicine shall have continuing  
2 jurisdiction until the matter is final, the period of probation  
3 shall be extended until the matter is final and no petition for  
4 modification of penalty shall be considered while there is an  
5 accusation or petition to revoke probation pending against  
6 respondent.

7 K. Respondent shall submit satisfactory proof  
8 biennially to the Board of Podiatric Medicine of compliance with  
9 the requirement to complete fifty hours of approved continuing  
10 medical education for re-licensure during each two (2) year  
11 renewal period.

12 I have read the above Stipulation and Order, understand  
13 their terms, and agree in all respects thereto.

14 Dated: \_\_\_\_\_

15 DANIEL LUNGREN, Attorney General  
16 of the State of California

17 \_\_\_\_\_  
18 MICHAEL P. SIPE  
19 Deputy Attorney General  
20 Attorneys for Complainant  
21 Board of Podiatric Medicine  
22 Medical Board of California  
23 Division of Medical Quality  
24 Department of Consumer Affairs  
25 State of California

26 I concur in the Stipulation and Order.

27 Dated: \_\_\_\_\_

REY L. OCHOA, Esq.  
Attorney for Respondent

1 I have carefully read and fully understand the  
2 stipulation and order set forth above. I have discussed the  
3 terms and conditions set forth in the stipulation and order with  
4 my attorney Rey L. Ochoa, Esq. I understand that in signing this  
5 stipulation I am waiving my right to a hearing on the charges set  
6 forth in Accusation No. D-4919 on file in this matter. I further  
7 understand that in signing this stipulation the Board shall enter  
8 the foregoing order placing certain requirements, restrictions  
9 and limitations on my right to practice podiatric medicine in the  
10 State of California.

11 Dated: \_\_\_\_\_  
12  
13

14 \_\_\_\_\_  
15 PETER B. HOLUB, D.P.M.  
16 Respondent  
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## **EXHIBIT B**

Peter G. Holub, D.P.M.  
PO Box 988  
Lockhart, TX 78644-988

January 26, 1993

RE: In the Matter of the Accusation Against:  
Peter G. Holub, D.P.M., No. D-4919

Dear Board of Podiatric Medicine,

I have received the stipulation as presented to my attorney, Rey L. Ochoa, by the Deputy Attorney General, Michael P. Sipe.

In general, the board has contented itself with reproducing the criminal charges I pleaded nolo contendere to on July 29, 1991, in Orange County. This incident stemmed from my professional relationship with Peter S. Wadhams, D.P.M. who, although having completed a residency program and passed the oral exams, was not yet licensed to practice podiatric medicine.

As a result of this incident I've spent ten thousand dollars in legal fees, served 320 hours of community service, suffered significant loss of business and community standing, and to this day still suffer occasional bouts of psychic distemper. It is only recently, under the glorious Texas skies, that I have come to peace with you, the Board, and Doug Richie, D.P.M. Yes, I made a mistake but it has been corrected and I've forgiven myself.

I accept your order of license revocation, and cannot accept any of the terms and conditions which may stay this revocation.

Sincerely,

  
Peter G. Holub, D.P.M.

LAW OFFICE  
OF  
**REY L. OCHOA**  
ATTORNEY AT LAW  
240½ MAIN STREET, SUITE A  
POST OFFICE BOX 520  
SEAL BEACH, CALIFORNIA 90740  
TEL (310) 596-8033 • FAX (310) 594-6072

February 1, 1993

DANIEL E. LUNGREN  
Attorney General  
State of California  
DEPARTMENT OF JUSTICE  
110 West A Street, Suite 700  
Post Office Box 85266  
San Diego, California 92186-5266

Attention: Michael P. Sipe, Deputy Attorney General

RE: In the Matter of the Accusation Against:  
Peter B. Holub, D.P.M., No. D-4919

Dear Mr. Sipe:

Enclosed herein please find a letter dated January 26, 1993, from my client, Peter G. Holub, D.P.M., that he wished to be forwarded to you.

Very truly yours,

LAW OFFICES OF REY L. OCHOA

By 

REY L. OCHOA

RLO:pa

Enclosure: Letter from Peter B. Holub, D.P.M.

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## **EXHIBIT C**



1 DANIEL E. LUNGREN, Attorney General  
of the State of California  
2 MICHAEL P. SIPE [BAR No. 47150]  
Deputy Attorney General  
3 555 West Beech Street  
P. O. Box 85266  
4 San Diego, California 92186-5266  
Telephone: (619) 238-3391  
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6 Attorneys for Complainant

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BEFORE THE  
BOARD OF PODIATRIC MEDICINE  
MEDICAL BOARD OF CALIFORNIA  
DEPARTMENT OF CONSUMER AFFAIRS  
STATE OF CALIFORNIA

In the Matter of the Accusation  
Against:

No. D-4919

PETER B. HOLUB, D.P.M.  
915-1/2 Electric Avenue  
Seal Beach, CA 90740  
License No. E-3279,

A C C U S A T I O N

Respondent.

James Rathlesberger, complainant herein, charges and  
alleges as follows:

1. He is the Executive Officer of the Board of  
Podiatric Medicine of the Medical Board of California, State of  
California (hereinafter referred to as the "Board"), and makes  
these charges and allegations in his official capacity and not  
otherwise.

2. At all times material herein, PETER G. HOLUB,  
D.P.M., (hereinafter referred to as the "respondent"), held  
license number E-3279 issued by the Board. Said license was  
issued to respondent on or about June 7, 1985, and is currently  
in good standing.

1           3. Section 2497(a) of the Business and Professions  
2 Code <sup>1/</sup> provides that the Board may order the suspension of, or  
3 the revocation of, or the imposition of probationary conditions  
4 upon, a certificate to practice podiatric medicine for any of the  
5 causes set forth in Article 12 (commencing with Section 2220) in  
6 accordance with Section 2222.

7           4. Sections 2220, 2222, 2234 and 2227 provide that the  
8 Board may take action against all persons guilty of violating the  
9 provisions of the Medical Practice Act (§§ 2000 et seq.).

10           5. Section 2234 provides, in pertinent part, that the  
11 Board shall take action against any licensee who is charged with  
12 unprofessional conduct. Unprofessional conduct is defined  
13 therein, to include, in part: (a) violating or attempting to  
14 violate, directly or indirectly, or assisting in or abetting the  
15 violation of, or conspiring to violate any provisions of the  
16 Medical Practice Act.

17           6. Section 2264 provides that employing, directly or  
18 indirectly, the aiding, or the abetting of any unlicensed person  
19 or any suspended, revoked, or unlicensed practitioner to engage  
20 in the practice of medicine or any other mode of treating the  
21 sick or afflicted which requires a license to practice  
22 constitutes unprofessional conduct.

23           7. Section 2474 provides that any person who uses in  
24 any sign or in any advertisement or otherwise, the word or words  
25 "podiatrist," "foot specialist," or any other term or terms or  
26

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27           1. All statutory references are to the Business and  
Professions Code unless otherwise indicated.

1 any letters indicating or implying that he or she is a  
2 podiatrist, or that he or she practices podiatric medicine, or  
3 holds himself out as practicing podiatric medicine or foot  
4 correction as defined in Section 2472, without having at the time  
5 of so doing a valid, unrevoked, and unsuspended certificate as  
6 provided for in this chapter, is guilty of a misdemeanor.

7           8. Section 2472 provides in part that "podiatric  
8 medicine' means the diagnosis, medical, surgical, mechanical,  
9 manipulative, and electrical treatment of the human foot,  
10 including the ankle and tendons that insert into the foot and the  
11 nonsurgical treatment of the muscles and tendons of the leg  
12 governing the functions of the foot."

13           9. Section 2497.5, subdivision (a) states that the  
14 Board may request the Administrative Law Judge, under his or her  
15 proposed decision in resolution of a disciplinary proceeding  
16 before the Board, to direct any licensee found guilty of  
17 unprofessional conduct, to pay to the Board a sum not to exceed  
18 the actual and reasonable costs of the investigation and  
19 prosecution of the case.

20           10. Section 490 provides that a board may suspend or  
21 revoke a license on the ground that the licensee has been  
22 convicted of a crime, if the crime is substantially related to  
23 the qualifications, functions, or duties of the profession for  
24 which the license was issued and that a conviction within the  
25 meaning of this section includes a conviction following a plea of  
26 nolo contendere.

27 //

1 FIRST CAUSE FOR DISCIPLINARY ACTION

2 11. Respondent is subject to disciplinary action  
3 pursuant to sections 490, 2220, 2222, 2234, 2227, and 2497(a) in  
4 that respondent has engaged in unprofessional conduct in having  
5 been convicted of a crime substantially related to the  
6 qualifications, functions, or duties of a podiatrist. The  
7 circumstances are as follows:

8 A. On or about December 19, 1990 respondent was  
9 practicing as a podiatrist in partnership with Peter S.  
10 Wadhams or was otherwise aiding and abetting Peter S.  
11 Wadhams (hereinafter Wadhams) in the unlawful practice of  
12 podiatric medicine. Although Wadhams had completed a  
13 residency program and passed the oral examination, he was  
14 not yet licensed to practice podiatric medicine.

15 B. The above acts led to respondent's conviction on or  
16 about July 29, 1991, pursuant to a plea of nolo contendere,  
17 for violating section 2474 in a case entitled, "The People  
18 of the State of California vs. Peter George Holub", before  
19 the Municipal Court of the California, County of Orange,  
20 West Orange County Judicial District, case number SBW  
21 213655APO. As a result of said conviction, respondent was  
22 placed on three years of summary probation.

23 C. Respondent's plea was to count 2 of the Complaint,  
24 which read:

25 " On or about 12-19-90, PETER GEORGE HOLUB AND PETER S.  
26 WADHAMS, in violation of Section 2474 of the Business  
27 and Professions Code, a MISDEMEANOR, did willfully and

1 unlawfully use in a sign, advertisement and otherwise  
2 the words, "podiatrist", "foot specialist" and other  
3 terms and letter indicating and implying that he is a  
4 podiatrist, and that he practices podiatric medicine,  
5 and did hold himself out as practicing podiatric  
6 medicine and foot correction, without having at the  
7 time of so doing a valid, unrevoked, and unsuspended  
8 certificate, authorizing such acts in California."

9 12. Respondent's conduct, as alleged at subparagraphs  
10 11A, 11B, and 11C, constitutes conviction of a crime  
11 substantially related to the qualifications, functions or duties  
12 of a podiatrist, and grounds for discipline under sections 490  
13 and 2234.

14 SECOND CAUSE FOR DISCIPLINARY ACTION

15 13. The matters alleged above at paragraph 11 are  
16 incorporated herein by reference as though fully set forth.

17 14. Respondent is subject to disciplinary action  
18 pursuant to sections 2222, 2234(a), 2227, and 2497(a) in that  
19 respondent has engaged in unprofessional conduct in having aided  
20 and abetted the unlicensed practice of podiatric medicine, in  
21 violation of section 2264. The circumstances are as follows:

22 A. On or about December 19, 1990 Jamie Porter, also  
23 known as Lynn Merrifield, visited respondent's office for a  
24 problem with her foot. She was seen by Wadhams after she  
25 filled out a medical history questionnaire.

26 B. Wadhams was introduced to Ms. Merrifield by  
27 respondent's receptionist as "Dr. Wadhams". Wadhams

1 examined Ms. Merrifield's feet and rendered a diagnosis of  
2 hammertoes. Wadhams then discussed treatment methods for  
3 such a condition. Wadhams then treated Ms. Merrifield with  
4 a scalpel to remove the corns.

5 C. At the time Wadhams treated Ms. Merrifield, he was  
6 associated with and employed by respondent. Wadhams shared  
7 respondent's offices. Respondent paid Wadhams a salary.  
8 Respondent's office was not approved as a place for a  
9 podiatric residency program.

10 D. At the time of Ms. Merrifield's visit to  
11 respondent's office, there were various indications that  
12 Wadhams was practicing podiatric medicine, as follows:

13 1) There were business cards at the reception  
14 area of respondent's office stating "Peter S. Wadhams,  
15 D.P.M." in the vicinity of business cards stating  
16 "Peter G. Holub, D.P.M.", both with the same business  
17 address, telephone number, style, coloring and logo.

18 2) While treating Ms. Merrifield, Wadhams wore a  
19 pin stating:

20 "PETER S. WADHAMS, D.P.M.

21 Podiatrist"

22 3) There was on the wall in the front  
23 lobby/waiting area of respondent's office a sign or

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advertisement or announcement stating in part that  
respondent:

"[was] pleased to announce  
the arrival of his new  
ASSOCIATE

Peter S. Wadhams, D.P.M.  
specializing in:

SURGERY of the FOOT and ANKLE

BIOMECHANICS

DIABETIC / INSENSITIVE FOOT CARE"

4) There was an appointment book which had  
appointments for both respondent and Wadhams.

E. Wadhams' treatment of Ms. Merrifield constituted  
the practice of podiatric medicine. Wadhams was an  
unlicensed person not authorized to engage in the practice  
of podiatric medicine, as defined in section 2472, at the  
time he treated Ms. Merrifield.

15. Respondent's conduct, as alleged above at  
subparagraphs 11A, 14A, 14B, 14C, 14D, and 14E, constitutes  
unprofessional conduct within the meaning of section 2264 in that  
respondent employed, aided or abetted Wadhams, an unlicensed  
person, to engage in the practice of podiatric medicine. Such  
constitutes grounds for discipline under sections 2222 and  
2234(a).

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1                                    THIRD CAUSE FOR DISCIPLINARY ACTION

2                    16. The matters alleged above at paragraphs 11 and 14  
3 are incorporated herein by reference as though fully set forth.

4                    17. Respondent knew or should have known that his  
5 offices had various signs, advertisement or other indications or  
6 implications of Wadhams practicing podiatric medicine when  
7 Wadhams did not have a valid licence to practice podiatric  
8 medicine.

9                    18. Respondent's conduct, as alleged at subparagraphs  
10 11A, 14A, 14B, 14C, 14D and 17, constitutes unprofessional  
11 conduct within the meaning of section 2234(a) in that, while  
12 Wadhams did not have a valid certificate to practice podiatric  
13 medicine, respondent employed, aided or abetted Wadhams to  
14 violate section 2474 or violated section 2474 himself by use of a  
15 sign, advertisement or other means or use of the word  
16 "podiatrist" or otherwise indicating or implying that Wadhams  
17 practiced podiatric medicine. Such constitutes grounds for  
18 discipline under sections 2222 and 2234.

19                    WHEREFORE, complainant requests that the Board hold a  
20 hearing on the matters alleged herein, and that, following said  
21 hearing, issue a decision:

22                    1. Suspending or revoking the Doctor of Podiatric  
23 Medicine certificate number E-3279 issued to Peter G. Holub,  
24 D.P.M.;

25                    2. Directing the respondent to pay costs pursuant to  
26 section 2497.5; and

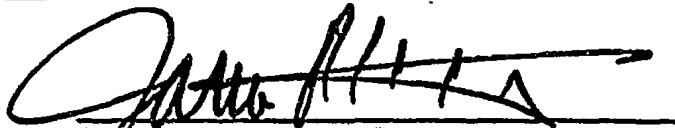
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3. Taking such other action as it deems proper.

DATED: September 2, 1992



JAMES RATHLESBERGER  
Executive Officer  
Board of Podiatric Medicine  
Medical Board of California  
State of California

Complainant

03576160SF91AD0641